

**WIGGINS CHILDS
PANTAZIS FISHER
GOLDFARB PLLC**
Advocates & Litigators

A PROFESSIONAL LIMITED LIABILITY COMPANY
1850 M STREET, N.W. · SUITE 720 · WASHINGTON, D.C. 20036

Direct Dial: 202-467-4489 · Fax: 205-314-0805
Email:TFleming@wigginschilds.com · Web:www.wigginschilds.com

TIMOTHY B. FLEMING
OF COUNSEL

October 26, 2016

The Honorable George B. Daniels
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 1310
New York, NY 10007

**VIA ECF
AND
FEDERAL EXPRESS**

**Re: *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570*
 *Hoglan, et al. v. Islamic Republic of Iran, et al., 1:11-cv-7550***
Submission of Damages Exhibit

Dear Your Honor:

As instructed by United States Magistrate Judge Sarah Netburn in her Reports and Recommendations issued on October 12, 2016, and October 14, 2016, and reiterated at a status conference last week in the above-referenced case, we enclose herewith an Exhibit listing her recommended damages awards for thirteen (13) Decedents' Estates and 203 individual family members, all plaintiffs in this case. This letter supplants my letter of October 17, 2016, and its attached chart, on the same subject. There were several errors on that chart. All errors have been identified and rectified on the chart attached hereto, and this new chart reconciles completely with the Reports and Recommendations of Magistrate Judge Netburn. We also attach a proposed form of order.

The *Hoglan* Plaintiffs listed on the attached chart do not object to Magistrate Judge Netburn's recommendations regarding their awards of compensatory damages and prejudgment interest, and request that a Final Partial Judgment be entered for each of these Plaintiffs as to their compensatory damages and prejudgment interest awards.

Magistrate Judge Netburn's denial of punitive damages without prejudice to a renewed motion for same was discussed at a status conference last week and a briefing schedule on that issue has been set.

Objections from other *Hoglan* Plaintiffs, for whom Magistrate Judge Netburn recommend against any award, will be filed separately in due course.

Respectfully submitted,



Timothy B. Fleming
Attorney for the *Hoglan* Plaintiffs

cc: All counsel of record via ECF

BIRMINGHAM, AL
DELAND, FL
NASHVILLE, TN
WASHINGTON, D.C.